

Program Notice

FGIS PN-02-09

10/01/02

RAILCAR FALL PROTECTION

1. PURPOSE

The purpose of this notice is to clarify the Federal Grain Inspection Service (FGIS) policy regarding the use of fall protection equipment when working (e.g., probe sampling) on top of railcars.

2. EFFECTIVE DATE

This action is effective immediately.

3. BACKGROUND

Slightly more than 5 percent of all injuries experienced by workers in the private sector involve falls from elevated surfaces, such as falls from roofs and scaffolds. While falls from railcars are not common, working on top of railcars expose FGIS personnel to several hazards--including serious injury--should a fall occur.

In 1996, OSHA issued an interpretative policy on the use of fall protection systems and certain work practices when employees work on top of railcars. In addition, many companies have implemented policies that address safe work practices and the use of fall protection equipment when employees work on top of railcars.

4. POLICY

a. When working at a rice mill, grain elevator, or similar facility, FGIS employees must adhere to the safety rules that are in effect at that facility, as well as to the policies established by OSHA, the Department, and the Agency. Consequently, FGIS employees shall use facility guardrails or fall arrest systems whenever appropriate and available provided the FGIS employees have:

- (1) Been thoroughly trained in the inspection, and safe and proper use of fall protection equipment (i.e., use of a full body harness and lanyard) and/or systems;

NOTE: Training may vary by location, depending on the complexity of the system. The local FGIS field office manager shall be responsible for ensuring the adequacy and appropriateness of the fall protection training provided to field office employees at each location.

- (2) If needed, been provided by the local FGIS field office with fall protection equipment (full body harness and lanyard) that is in good repair and compatible with the facility's fall protection system. (FGIS employees may use facility-provided fall protection equipment if such equipment is made available to them and is suitable for their use); and
 - (3) Examined the facility's fall protection system (and related equipment) and found it safe and in good working order prior to use.
- b. Before requiring FGIS employees to work on top of railcars, the FGIS field office manager shall ensure that the health and physical ability of the subject FGIS employees is adequate to properly use fall protection equipment and work safely on top of rail cars.
- c. FGIS personnel shall note that fall protection systems may not be available in many instances. For example, grain/rice-handling facilities generally do not provide fall protection systems in rail yards or along spur tracks away from loading and unloading structures due to rail clearance and other feasibility-related issues. Also, grain/rice-handling facilities may not install fall protection systems beyond the loading point at locations where railcar loading operations are infrequent or limited in scope. In these cases, FGIS employees must follow proper safety practices and seek guidance from the FGIS field office manager and facility management regarding any safety concerns.

NOTE: This policy is only mandatory for FGIS employees. All other official inspection and weighing agencies should work with local facility management to establish guidelines applicable to their employees.

5. FILING INSTRUCTIONS

File a copy of this notice in Book I, Chapter 2 of the Grain Inspection Handbook, and Chapter 2 of the Rice Inspection Handbook, Chapter 2 of the Bean Inspection Handbook, and Chapter 2 of the Pea and Lentil Inspection Handbook until these handbooks are updated to reflect the clarified policy.

6. QUESTIONS

Please direct any questions to the local FGIS field office manager or to the Safety and Health Office at (202) 720-0244.

/s/ David Orr

David Orr, Director
Field Management Division